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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF TIFFANY L.
CHAPMAN

1. My name is Tiffany L. Chapman. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 2012. I currently reside in Clackamas County. I am employed in Multnomah County in the field of human services and community organizing.

3. I have participated in public marches, community events, including such activities in Portland, Oregon as the 2017 & 2020 Womxn's Marches, the 2019 Lights for Liberty Rally & March, and the 2019 PDX Climate Strike. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters. I have never been arrested or detained by law enforcement as a result of participation in such an event.

4. On Tuesday June 9, 2020, I participated in a local BLM protest organized by black youth at the Milwaukie Riverfront Park. Several local elected officials saw me there. The City of Milwaukie worked with the organizers and there was very minimal police presence. The protest was entirely peaceful—I felt safe bringing my child.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video footage of what I understand to be the incident above.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

8. I do not feel safe participating in Black Lives Matter rallies or other community events in the vicinity of the Mark Hatfield Federal Courthouse in Portland due to the risk of being detained by unidentified paramilitary personnel.

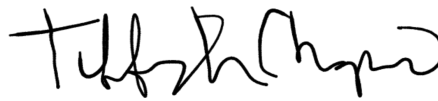
9. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because I am a single parent. I do not have a family support system in the area and I am the sole financial support and caregiver for a minor child. Disruption of our lives by loss of

income or isolating me from her would not only cause her trauma and immediate physical danger, but would risk the loss of our housing and financial stability.

10. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above causes me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.

A handwritten signature in black ink, appearing to read 'Tiffany L. Chapman', written over a horizontal line.

Tiffany L. Chapman